

**UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF OREGON**

In re

EDWARD G BRASLEY

) Case No. 315-33033-TMB13
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**TRUSTEE'S OBJECTION TO
CONFIRMATION AND MOTION
TO DISMISS**

Debtor(s).)

Wayne Godare, the Standing Chapter 13 Trustee Objects to Confirmation of the above case for the reason(s) set out below:

- a. Plan is not feasible:
- b. Case/Plan is not proposed in good faith or is forbidden by law:
- c. Plan does not commit all of debtor's excess projected disposable income pursuant to 11 U.S.C. §1325(b)(1)(B) for the applicable commitment period:
- d. Plan does not meet the best interest test of 11 U.S.C. §1325(a)(4):
- e. Filing/documentation is deficient: **As requested at the §341(a) hearing, please provide the Trustee with the following:**
 1. Copy of the Wage Order filed with the Court;
 2. Verification of the payoff date for the debtor's retirement loan(s) as stated on Schedule I, if within the life of the Plan please provide a step payment in ¶1; and
 3. The Trustee objects to the claim of exemption 11 U.S.C. §522(d)(2) as it pertains to the 1993 Ford F150. Please provide the Trustee with an Amended Schedule C.
- f. Other: **As requested at the §341(a) hearing, the debtor's excess projected income as stated on Schedule J is \$770.00, ¶1(a) of the Plan should be increased accordingly. In the alternative provide the Trustee with an Amended Schedule J that shows the debtor's ability to make a Plan payment not less than \$258.**

If within 7 days prior to the scheduled confirmation hearing, debtor fails to take all necessary steps to satisfy each objection marked above, the Trustee may, in his discretion, urge the court for an order dismissing the case without further notice.

I certify that on July 22, 2015, copies of the above Objection and Motion were served on the debtor(s) by first class mail and any debtor(s) attorney by ECF.

DATED: July 22, 2015

/s/ Wayne Godare, Trustee

MOTSCHENBACHER & BLATTNER LLP
(jt for mn)